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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR - 2 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Part 90 of the)
Commission's Rules to Facilitate)
Future Development of SMR Systems)
in the 800 MHz Frequency Band)

PR Docket No. 93-144

and

Implementation of Section 309(j))
of the Communications Act -)
Competitive Bidding)
800 MHz SMR)

PP Docket No. 93-253 ✓

To: The Commission

REPLY COMMENTS

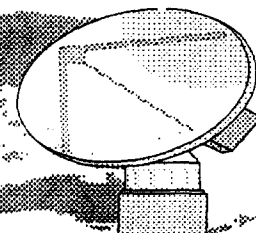
Date: March 2, 1995

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VoiceLink

COMMUNICATIONS



240 EAST EL NORTE PARKWAY Escondido California 92026 (714) 786-6853 Fax (714) 786-8160

February 24, 1995

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Dear Chairmen,

On behalf of 43+ 800MHz licensees, 30 of whom are currently in the process of constructing a commercial system, and 13 of whom are anticipating the opportunity of doing the same, we implore you to take under advisement the PCIA/NABER proposal as well as the Joint Reply Comments prepared by Meyer, Fallor, Weisman and Rosenberg. We are part of a group that contacted you last August regarding the freeze and future auctioning of 800MHz spectrum. Understanding that the Communications industry is exploding and that the result of this is a changing (and necessarily so) regulatory framework, we are contacting you again to draw your attention to the following facts.

SMR, unlike PCS, is not a brand new industry. It is not touted or championed by wealthy corporate giants as the communications system of the future, with the exception of Nextel (and that yet remains to be proven). Traditional SMR is tried, proven and proven to be beneficial to its users. It is a technology and an industry with a history, the backbone of which consists of hundreds, even thousands, of operators nationwide. We are not asking that the Commission adopt new policies that will guarantee our long term success, but rather we are asking that the Commission insure that regulatory changes do not put us at the mercy of the AT&Ts of the SMR industry. The PCIA/NABER proposal for smaller local (BEA's) is more consistent with the size and scope of incumbent SMR's. However, it permits everyone, including those hoping to offer wide area digital service, a competitive chance for success without endangering the livelihoods of traditional operators. The regulatory framework should protect not only our interests in maintaining what we have, but also in expanding our present systems and services.

Because of a lack of spectrum, many of us have been forced to file for conventional channels or to enter into agreements with general category licensees. There are several examples of these channels operating successfully for commercial purposes. Voice Link Communications is a new corporation formed for the purpose of utilizing the available general category licenses that otherwise would not be constructed. We have dedicated hundreds of thousands of dollars to our system(s) and could

not afford to shut down operations in order to retune all our equipment, while at the same time waiting weeks or even months for a relocation we don't even need.

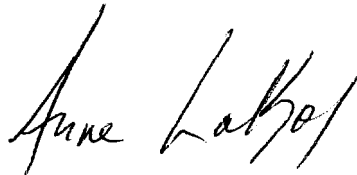
If Nextel is willing to pay for mandatory relocation, will Nextel show the same willingness to pay for the engineering necessary to redesign the frequency configuration of 30 to 50 conventional channels, not to mention to make up for the capital lost from shutting down operations?

Clearly the consequences of such a proposal have not been thoroughly examined. Or have they? As a brand new company, we are facing enough obstacles without having such an ominous proposal looming in our future. For example, a tower on which 28 of our licenses are licensed was promised to us for construction. Dial Call's engineer then reversed that agreement just three weeks prior to our first deadline.

Chairmen, we ask that you give the veterans and traditional SMRs of the industry due consideration. It is not necessary to subordinate their needs in order to satisfy those of the newcomer. Both can benefit from one another provided that neither is given preferential treatment.

With all due respect, Chairmen, we are:

Anne Lakos
SMR Services
892 Hayes
Irvine, CA 92720



Maurice Lyon
Voice Link Communications
240 E. El Norte Pkwy.
Escondido, CA 92026



Voice Link Licensees in Columbia, SC

Duane R. Bailey	WPFF688	Cyril H. Mitchell	WPFH280
Robert W. Baird	WPFD738	Harry N. Nichols	WPFF692
Michael A. Delgado	WPET251	J. Paul Opdycke	WPET373
James S. Dill	WPFG208	John C. Owen	WPET381
Michael C. Fobes	WPFR249	Maurice Parkinson	WPFG606
Thomas A. Fowler	WPFF696	Martha Pierozak	WPFF695
Raney Hall	WPFG622	Judy Reynolds	WPFT925
Bobby Hazelton	WPFR273	Mendell Roberts	WPFC884
Richard C. Jensen	WPFF699	Jerden C. Rodgers	WPFC880
Kapadia, Inc.	WPFD729	Marc H. Rubin	WPFF687
Stephen N. Kirk	WPET385	Mark W. Strong	WPFF693
Thomas Kleehammer	WPET389	Charles W. Swaner	WPFG211
Mark Kronenfeld	WPFX323	Michael Curtis Taylor	WPFH276
Denton R. Lee	WPFG608	Susan Thomason	WPFF698
Maurice C. Lyon	WPFD740	Typecraft, Inc.	WPRF267